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NEW SITE IDENTIFICATION

Part A - To Be Completed By Observer	
1. Person Initiating report: D. E. Raunig	Phone: 526-5501
Contractor WAG 3 Manager: C. S. Evans CPP 3/18/99	Phone: 526-1493
2. Site Title: Tank Farm Soil Stockpiles / ~~ECA-95~~ 97 3/13/98	

3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram should be included to help with the site visit.

Two stockpiles of soil are located in the Northeast corner of ICPP. The southern boundary of the stockpile site is Palm Avenue, the northern boundary is Chestnut Avenue, and the eastern boundary is Lodge Pole Street. The site consists of two tarp covered stockpiles of soil that originated in the Tank Farm area. The attached map illustrates the ICPP facility and the location of the stockpiles, (see attachment 1).

The stockpiles were generated during the high-level liquid waste Tank Farm upgrade project in the years 1993,94,95. The project excavated several areas of the ICPP Tank Farm. The soils were monitored for radionuclides as they were excavated. Based on the activity concentration, the soils were segregated into separate piles. The field instrument readings on the larger 1430 cubic yard stockpile were 0-3 milli Rem per hour. The field instrument readings on the smaller 70 cubic yard stockpile is 3-50 milli Rem per hour. Additional 3-50 milli Rem per hour soils were placed in 2ft x 4ft x 8ft soil boxes and transported to the south side of the CPP 1683 (Rub tent). The location later was designated CERCLA site, CPP-92.

Potential contaminates contained in the stockpiled soil piles include radionuclides and suspected listed wastes, (see attachment 2, Tank Farm listed codes). The codes are subject to change per regulator negotiation.

Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:

☒ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is included in the FFA/CO.
WAG: 3 Operable Unit: 3-14

☐ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation, and should NOT be included in the INEEL FFA/CO Action Plan.

5. Basis for the recommendation:

The basis for including the soil stockpiles as a new FFA/CO, CERCLA site includes the following logic.

The stockpiles in their present state are not managed under the RCRA or CERCLA programs. The source of contamination is believed to be past releases to the soil column from Tank Farm process piping along with other plant processes. The contaminants in the soil originated from releases that have been included in the CERCLA program, via the FFA/CO agreement.

The stockpiles are not contained and represent a potential threat to human health and the environment. Limited data is available on the stockpiles and additional data will be required for disposition, (see attachment 3, summary of same source boxed soil data). The soil stockpiles are known to contain radioactive constituents and are believed to contain potentially listed constituents.

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: C.S. Evans Signature: _____ Date: 3/12/98

Part C - To Be Completed By DOE WAG Manager

7. DOE WAG 3 Manager Concurrence: T. W. Jenkins

WAG 3 Operable Unit: 3-14

☒ Concur with recommendation.

☐ Do not concur with the recommendation. Explanation follows:

Name: T. W. Jenkins Signature: _____ Date: 3/13/98

Part D - To Be Completed By the INEEL FFA/CO Responsible Program Managers (RPM's)

8. FFA/CO RPM 's Concurrence:

☒ Concur with recommendation.

☐ Do not concur with the recommendation. Explanation follows:

For DOE-ID

Name: Kahleen Hain Signature: Kathleen S Hain Date: 3/14/98

For EPA Region X Name: Wayne Pierre	Signature: Wayne Pierre	Date: 9/3/98
For State of Idaho Name: Dean Nygard	Signature: Dean J. Nygard	Date: 10/16/98

From: Talley W Jenkins@Exchange on 03/08/99 11:13 AM

To: Debra L Ellis/DLG/LMITCO/INEEL/US@INEL, Paul W Arpke/AWP/LMITCO/INEL/US@INEL
cc: Robert E James/JAMERE/LMITCO/INEEL/US@INEL, Carol S Evans/EVANCS/LMITCO/INEEL/US@INEL, Talley W Jenkins@Exchange, Kathleen E Hain@Exchange

Subject: New Site Identification forms for WAG 3

The New Site Identification (NSI) forms for site CPP-96, -97, -98, and -99 are to be added to operable unit (OU) 3-13. Site CPP-96 is part of Group 1 and sites CPP-97, -98, and -99 are part of Group 3. Following signature of the OU 3-13 Record of Decision, site CPP-96 along with the rest of Group 1 will be OU 3-14 work scope for a final decision.

If you have questions, let me know.

Thanks,

Talley

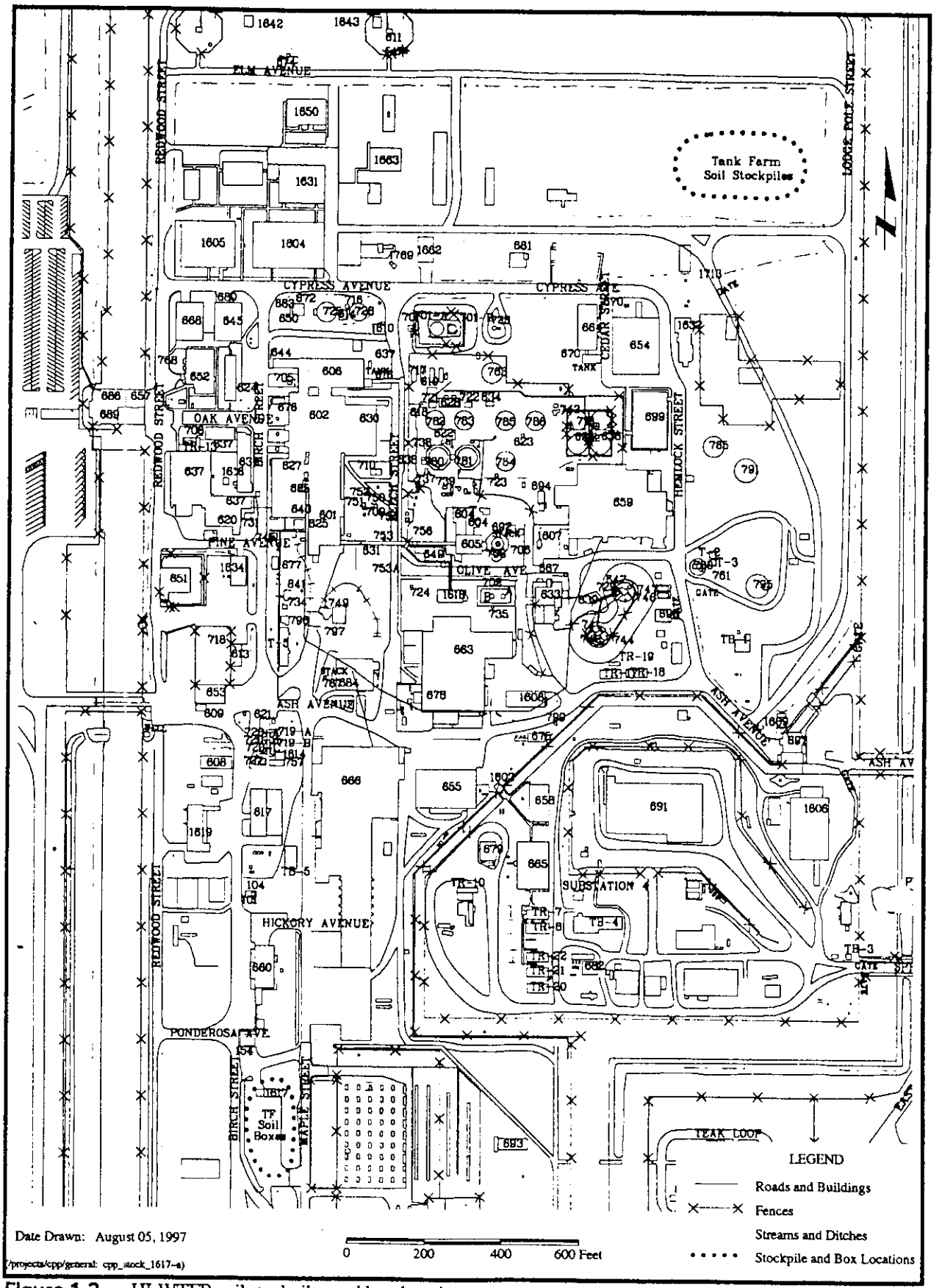

Figure 1-3. HLWTFR soil stockpiles and box locations.

Attachment 2.

Historical Discharge Codes Associated with the PEW System

Substances known to have been discharged to the PEW and High Level Liquid Waste Tank Farm. Listed Waste Determination Report, WINCO 1132, June 1993.

F-, P-, and U- listed

Substance	CAS #	RCRA
1,1,1 - Trichloroethane	71-55-6	F002
1,1,2 - Trichloroethane	79-00-5	F002
Carbon Tetrachloride	56-23-5	F002
Methylene Chloride	75-09-2	F002
Tetrachloroethylene	127-18-4	F002
Toluene	108-88-3	F002
Trichloroethylene	79-01-6	F002
Benzene	71-43-2	F005
Carbon Disulfide	75-15-0	F005
Isobutyl Alcohol	78-83-1	F005
Methyl Ethyl Ketone	78-93-3	F005
Pyridine	110-86-1	F005
Potassium Cyanide	151-50-8	P098
Silver Cyanide	506-64-9	P104
Sodium Azide	26628-22-8	P105
Sodium Cyanide	143-33-9	P106
Ammonium Vanadate	7803-55-6	P119
Vanadium Oxide	1314-62-1	P120
Acetonitrile	75-05-8	U-003
Analine	62-53-3	U012
Benzene	71-43-2	U019
Chloroform	67-66-3	U044
Methylene Chloride	75-09-2	U080
1,4-Dioxaen	123-91-1	U108
Formaldehyde	50-00-0	U122
Formic Acid	64-18-6	U123
Hydrazine	302-01-2	U133
Hydrogen Fluoride	7664-39-3	U134
Methyl Ethyl Ketone	78-93-3	U159
Phenol	108-95-2	U188
Pyridine	110-86-1	U196

Selenium Dioxide	7783-00-8	U204
Tetrachloroethylene	127-18-4	U210
Carbon Tetrachloride	56-23-5	U211
Thiourea	62-56-6	U219
Toluene	108-88-3	U220
1,1,1-Trichloroethane	71-55-6	U226
1,1,2-Trichloroethane	79-00-5	U227
Trichloroethylene	79-01-6	U228

These soils were placed in boxes and stockpiles. The 100 cpm — 3 mrem/hr soil stockpile was sampled and analyzed for total metals and radionuclides. Based upon the "20X" rule (developed by EPA) which converts total metal to TCLP metals concentrations based upon sample size and dilution factors, none of the metal sample results exceeded the TCLP limit, therefore, this stockpile is not considered to have characteristic hazardous waste. The following table summarizes the detected radionuclides which are considered to be COPCs by virtue of the maximum value exceeding the site background levels.

Analyte	Average (mg/kg or pCi/g)	Standard Deviation (mg/kg or pCi/g)	Number of Sample Detects	Maximum (mg/kg or pCi/g)	Minimum (mg/kg or pCi/g)
Sr-90	58.9	93.9	11	330	6.6
Pu-238	0.22	0.11	9	0.43	0.11
Am-241	0.12	0.08	2	0.17	0.06
Np-237	0.13	0.03	7	0.17	0.10
Tc-99	1.5	0.4	11	2.2	0.9
Co-60	0.09	NA	1	0.09	0.09
Cs-134	0.16	0.04	2	0.19	0.13
Cs-137	34.0	32.5	11	114	3.81
Eu-154	0.84	NA	1	0.48	0.48